

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

_____)	
CLEMENT WOGHIREN,)	
)	
Plaintiff,)	
)	
v.)	CIVIL ACTION NO. 04-12148 WGY
)	
WYETH, And)	
WYETH BIOPHARMA,)	
)	
Defendants.)	
_____)	

**JOINT MOTION TO EXTEND DEADLINE FOR FILING DISPOSITIVE
MOTIONS**

The parties in this action respectfully request the Court extend the deadline for filing dispositive motions seventy (70) days from July 8, 2005 to September 16, 2005.

As grounds therefore, the parties state:

1. The parties were previously involved in attempts to schedule a court-ordered mediation. The attempts at scheduling mediation were sufficiently time consuming as to prevent the parties from propounding discovery. Ultimately, the parties decided against the use of mediation.
2. Defendants have granted prior extensions to the plaintiff regarding discovery, and received interrogatory responses on July 5, 2005.
3. This Court has extended the deadline for completing discovery until September 15, 2005.

4. Notwithstanding this Court's Order, and without having completed discovery, counsel for both sides are unable to assess the facts necessary for filing a dispositive motion.
5. The requested extension is not being requested for purposes of delay.
6. Pursuant to Local Rule 7.1, the parties have conferred in an attempt to resolve or narrow the issues presented by this motion and counsel for Clement Woghiren has entered jointly into this motion.

WHEREFORE, the parties respectfully request that this Honorable Court extend the deadline for filing dispositive motions by 70 days to September 16, 2005.

CLEMENT WOGHIREN,

WYETH and WYETH BIOPHARMA

By His Attorney,

By Its Attorney,

/s/ John F. Tocci
John F. Tocci, Esq.
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/s/ Michael A. Fitzhugh
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Attorney for Defendants

Dated: July 8, 2005

Dated: July 8, 2005

CERTIFICATE OF SERVICE

I hereby certify that I filed the above document using the Court's Case Management/Electronic Case Filing System and have served the above document upon all counsel of record pursuant to the Administrative Procedures Governing the Filing and Service by Electronic Means on July 8, 2005.

/s/ Michael A. Fitzhugh